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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

SSA BONDS ANTITRUST LITIGATION

This Document Relates To All Actions

1:16-cv-03711-ER

**STIPULATION REGARDING SERVICE, TIME TO ANSWER, MOVE, OR
OTHERWISE RESPOND, AND OTHER PRELIMINARY MATTERS AS TO THE
NEW DEFENDANTS LISTED IN THE CONSOLIDATED AMENDED
CLASS ACTION COMPLAINT**

1. By stipulation dated August 19, 2016, so ordered by the Court on August 22, 2016 (Dkt. No. 36; the “Stipulation and Consolidation Order”), nine related individual actions alleging a conspiracy to manipulate the prices of sub-sovereign, supranational, and agency (“SSA”) bonds were consolidated under this docket and captioned as “*In re SSA Bonds Antitrust Litigation*.”

2. After entry of the Stipulation and Consolidation Order, the following related actions were filed and thereafter consolidated with the nine prior actions as Subsequent Actions under paragraph 3 of the Stipulation and Consolidation Order (the fourteen filed actions, collectively, the “Individual Cases”):

a. *Louisiana Municipal Police Employees’ Retirement System, et al. v. Bank of America Corporation, et al.*, Case No. 16-cv-07991 (S.D.N.Y.), filed on October 12, 2016, consolidated with Lead Action on October 24, 2016 (Dkt. No. 52);

b. *KBC Management NV, et al. v. Bank of America Corporation, et al.*, Case No. 16-cv-8621 (S.D.N.Y.), filed on November 4, 2016, consolidated with Lead Action on November 14, 2016 (Dkt. No. 69);

c. *City of Riviera Beach Police Officers' Pension Fund, et al. v. Bank of America, N.A., et al.*, Case No. 16-cv-9398 (S.D.N.Y.), filed on December 6, 2016, consolidated with Lead Action on December 12, 2016 (Dkt. No. 76); and

d. *Irving Firemen's Relief and Retirement Fund, et al. v. Bank of America Corporation, et al.*, Case No. 16-cv-9656 (S.D.N.Y.), filed on December 14, 2016, consolidated with Lead Action on December 21, 2016 (Dkt. No. 87).

e. *The Police Retirement System of St. Louis v. Bank of America Corporation, et. al.*, Case No. 17-cv-298 (S.D.N.Y.), filed on January 13, 2017, consolidated with Lead Action on March 1, 2017 (Dkt. No. 106).

3. After the filing of the Consolidated Class Action Complaint on April 11, 2017 (Dkt. No. 130), some plaintiffs withdrew on May 10, 2017, namely City of Bristol Pension Fund, Louisiana Municipal Police Employees Retirement System, Oklahoma Police Pension and Retirement System (Dkt. No. 148), and Irving Firemen's Relief and Retirement Fund (Dkt No. 149).

4. The following parties are listed as Defendants in the Consolidated Amended Class Action Complaint, filed on November 3, 2017 (Dkt. No. 306):

Bank of America, N.A.
Bank of America Merrill Lynch International Limited
Merrill Lynch International
Merrill Lynch, Pierce, Fenner & Smith Inc.
Barclays Bank plc
Barclays Capital Inc.
Barclays Services Limited
Barclays Capital Securities Limited

BNP Paribas S.A.
BNP Paribas Securities Corp.
Citigroup Inc.
Citibank N.A.
Citigroup Global Markets Inc.
Citigroup Global Markets Limited
Crédit Agricole Corporate and Investment Bank
Credit Suisse AG
Credit Suisse Securities (USA) LLC
Credit Suisse Securities (Europe) Ltd.
Credit Suisse International
Deutsche Bank AG
Deutsche Bank Securities Inc.
HSBC Securities (USA) Inc.
HSBC Bank plc
Nomura Securities International, Inc.
Nomura International plc
Royal Bank of Canada
RBC Capital Markets, LLC
RBC Europe Limited
The Toronto-Dominion Bank
TD Securities Limited
TD Securities (USA) LLC
Hiren Gudka
Bhardeep Singh Heer
Amandeep Singh Manku
Gary McDonald
Shailen Pau

ACCORDINGLY, IT IS HEREBY STIPULATED THAT:

1. The undersigned counsel for each Defendant agrees to waive service of process in the consolidated action and each of the Individual Cases comprising this consolidated action, on behalf of his respective client, expressly reserving the right to contest whether any party in this consolidated action is properly named, and without waiver of any defenses, including those related to personal jurisdiction and venue.
2. The deadlines for all Defendants to answer, move, or otherwise respond to any complaint in this consolidated action are stayed as provided in all prior stipulations and orders, to

the extent that such deadlines presently exist or may come to exist following the execution of this Stipulation. The stay shall be without prejudice to any party's right to seek relief from the stay.

3. The following schedule shall apply to all Defendants:

a. Defendants will file any motion(s) to dismiss by December 12, 2017.

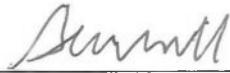
b. Plaintiffs must file any opposition to motion(s) to dismiss by January 31, 2018.

c. Defendants will file their reply (or replies) to Plaintiffs' opposition by March 2, 2018.

d. Nothing in this stipulation is intended to curtail the rights under the Federal Rules that might otherwise exist absent this agreement.

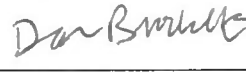
DATED: New York, New York
November 22, 2017

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DATED: New York, New York
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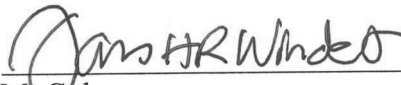
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Counsel for The Toronto-Dominion Bank, TD Securities Limited, and TD Securities (USA) LLC

IT IS SO ORDERED.

DATED: November 28, 2017

A handwritten signature in blue ink, appearing to read 'Edgardo Ramos', is positioned above a horizontal line.

Hon. Edgardo Ramos
United States District Judge